

**REMARKS**

The Office Action mailed January 11, 2006 has been carefully considered.  
Reconsideration in view of the following remarks is respectfully requested.

**Rejection(s) Under 35 U.S.C. § 103(a)**

Claims 1-3, 10, 15-21, 28, 35 and 36 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Degani et al. (US 6,282,100, "Degani").

The Office Action acknowledges that Degani does not disclose using solder balls to connect a package substrate to a PWB as all the independent claims recite. Degani in fact states that the disclosed method of connecting IIS 15 to PWB 21 "precludes solder ball or solder bump interconnections" (Degani, col. 4, lines 13-14). The Office Action nevertheless contends that since the use of solder ball bonding is disclosed in other parts of the patent, it would be obvious to extend that use to the connection between IIS 15 and PWB 21. (Office Action, #7).  
Applicants respectfully disagree.

Degani explains at length why the use of solder balls is undesirable. Degani seeks to simplify processing by obviating the need to provide a polyimide layer, which "requires patterning to accommodate the under bump metallization." (Degani, col. 3, ll. 44-54). Further, IIS 15 of Degani merely operates as an "expander," and, with the exception of the "possibility of a single power or ground plane interconnection," has no "direct interconnection" with the PWB 21. (Degani, col. 4, ll. 15-19). Such an expedient is intended to simplify the connection structure of the Degani device by migrating all the connection sites of chip 11 to the periphery of IIS 15 where more of them can be accommodated without having to rely on solder ball interconnections between the chip and the IIS. Applicants respectfully submit that such a critical function cannot simply be dismissed and directly contradicted in the manner proposed by the Office Action proposes.

**Conclusion**

In view of the preceding discussion, applicant respectfully urges that the claims of the present application define patentable subject matter and should be passed to allowance.

If the Examiner believes that a telephone call would help advance prosecution of the present invention, the Examiner is kindly invited to call the undersigned attorney at the number below.

Please charge any additional required fees, including fees for any extensions of time necessary to render timely the filing of the instant Amendment and/or Reply to Office Action, for which applicant hereby respectfully petitions, or credit any overpayment not otherwise credited, to our deposit account no. 50-1698.

Respectfully submitted,  
THELEN REID & PRIEST, L.L.P.

Dated: 2/17/06

  
Suvashis Bhattacharya  
Reg. No. 46,554

Thelen Reid & Priest LLP  
P.O. Box 640640  
San Jose, CA 95164-0640  
Tel. (408) 282-1855  
Fax. (408) 287-8040